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April 9, 1992

Louise Bardy  
Washington State Department of Ecology  
Northwest Regional Office  
3190 160th Avenue SE  
Bellevue, WA 98008-5452

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DEPT. OF ECOLOGY

Dear Ms. Bardy:

Regarding: MTCA independent cleanup at T106W-CFS

In follow up to last week's telephone conversation, the Port of Seattle would like to inform the Department of Ecology of its independent cleanup activities at Terminal 106W-CFS, located at 3629 Duwamish Avenue South, Seattle, Washington. This terminal is used as a container freight station and transload facility. A transload dock is located on the southwest corner of the property. For a number of years the transfer of lead ingots from rail cars on the south side of the dock to shipping containers on the north side of the dock occurred here. Recent monitoring for potential lead exposure to employees and sampling for potential environmental impacts resulted in the perception of a site demonstrating lead toxicity above MTCA cleanup standards and the complete termination of the lead operation.

Several warehouses are located north and east of the transload dock in an area primarily asphalt-surfaced. Five catchbasins running parallel to the north edge of the dock provide drainage for this area. The site is bordered to the south by Stoneway Concrete and to the west by the East Waterway of the Duwamish. East of the site are various warehouse buildings and Duwamish Avenue South. Approximately five feet south of the transload dock is an active railroad track spur. Twenty feet south of the transload dock is a seal-coated asphalt surface. The area between the asphalt surface and the transload dock is not paved.

The Port's consultant, Shannon and Wilson, has performed a remedial investigation discovering lead contaminated sediments in the catchbasins just north of the transload dock (420 to 4,200 ppm), lead contaminated surface soils just south of the transload dock (2.2 to 510 ppm; one sample 1,200 ppm), and elevated levels of lead in the dust settled on and around the transload dock (270 to 14,000 ppm). Surface samples at moderate distances from the transload dock and all subsurface samples (below 3 inches) showed no elevated levels of lead. The contaminated area is conservatively estimated to be 300 feet by 30 feet. Analytical results are enclosed for your examination.

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The Port would like to remove the elevated levels of lead in a most expeditious manner, based upon the focused feasibility study provided by Shannon and Wilson. To properly dispose of the wastes accumulated in the cleanup of this site, the Port has applied to Ecology for a RCRA hazardous waste site identification number as a "one time only" generator. Upon receipt of that number the Port intends to immediately sweep and wash the transload dock and all surrounding asphalt surface areas. Catch basins and all connecting lines will be subsequently cleaned. The line outfall will be sealed throughout the entire process and wash water will be continually pumped and collected for proper disposal. The remaining surface soils south of the transload dock will be removed only after issuance of a Shoreline Permit, which unfortunately will take several months to obtain.

It is hoped that this will serve to provide sufficient notification to the Department of Ecology and be in accordance with the Washington State Model Toxics Control Act, Chapter 70.105D RCW. Should you have any questions or concerns, please do phone me (728-3161).

Thank you for your assistance.

Yours truly,



Baz Stevens

Enclosure  
5050V/BS